

CAROLYN DYKES, Individually
and on behalf of all others
similarly situated,

Plaintiff,

v.

VAN RU CREDIT
CORPORATION.

Defendant.

Case No. 1:17-cv-01111-AJT-JFA

Defendant, Van Ru Credit Corporation (“VRC”), through counsel and under the Federal Rules of Civil Procedure, hereby requests the Court enter an Order granting VRC a brief twenty-one (21) day extension of time to respond to the Complaint filed by plaintiff, Carolyn Dykes (plaintiff), and states:

2. On November 6, 2017, VRC was served with a copy of the Complaint.

3. Therefore, VRC's responsive pleadings are due on November 27, 2017.

4. VRC recently retained counsel and is in the process of reviewing the file and preparing a response. Despite due diligence and good faith efforts, VRC and its counsel requires an extension of time to investigate the allegations in the Complaint, prepare a responsive pleading, and explore the potential for early resolution. Accordingly, VRC requests a brief twenty-one (21) day extension of time, until December 18, 2017, to respond to plaintiff's Complaint.

5. Counsel for VRC and counsel for Plaintiff conferred regarding the requested extension. Plaintiff is unopposed to the relief requested herein.

6. VRC has not requested any prior extensions in this action.

7. There are no pending hearings or matters currently before the Court.

8. Defendant waives a hearing on this motion.

WHEREFORE, Defendant, Van Ru Credit Corporation, respectfully requests this Court grant an extension through and including December 18, 2017, to file Responsive Pleadings to Plaintiff's Complaint, and for such other relief as this Court deems proper.

Dated: 11/22/2017

Respectfully submitted

/s/Harijot S. Khalsa

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*Attorney for Defendant,
Van Ru Credit Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2017, a copy of the foregoing was served electronically via CM/ECF on the following:

Thomas Ray Breeden, Esq.
Thomas R. Breeden PC
10326 Lomond Drive
Manassas, Virginia 20109

By: /s/Harijot S. Khalsa
Harijot S Khalsa, Esq.

*Attorney for Defendant,
Van Ru Credit Corporation*